

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

AUG 30 1999

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OFFICE OF THE SECRETARY

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In the Matter of

Truth-in-Billing
and
Billing Format

CC Docket No. 98-170

COMMENTS OF SBC COMMUNICATIONS INC.

SBC Communications Inc.¹ (SBC) files these Comments in response to the invitation of the Federal Communications Commission (FCC or Commission) for public comment that was contained in the *Notice of Public Information Collection(s) Submitted to OMB for Review and Approval*, released in the Federal Register on July 30, 1999. The topic for public comment was the FCC's resubmission of the agency's information collection requirements in CC Docket No. 98 - 170, *In the Matter of Truth-in-Billing and Billing Format*, as required by the Paperwork Reduction Act of 1995, Pub. L. 104-13 (PRA).

I. Burden Estimate Not Accurate

The Commission failed to accurately assess the burden on carriers of compliance with the Truth-in-Billing rules as written, particularly in light of the major effort on Y2K compliance. USTA filed a Petition for Reconsideration on behalf of the industry on the "new service provider issue," which SBC strongly supports. SBC has also filed a Petition

¹ SBC Communications Inc. is the parent company of various subsidiaries, including wireline telecommunications carriers. These subsidiaries include Southwestern Bell Telephone Company (SWBT), Pacific Bell, Nevada Bell, and The Southern New England Telephone Company (SNET). The abbreviation "SBC" shall be used herein to include each of these subsidiaries as appropriate in the context.

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SBC Communications Inc.
August 30, 1999

for Reconsideration of the schedule for implementation on two other aspects of the Truth-in-Billing requirements: identifying the "deniable" and "non-deniable" charges on the bill (for Southwestern Bell Telephone Company and Pacific Bell) and the requirement that the service provider associated with each charge be clearly identified (for Southern New England Telephone Company (SNET) only). SNET had already begun work on a billing system change that will allow it to identify the service provider when the service provider bills through a billing aggregator and that change will be completed by October 1, 1999. Thus, SBC only sought reconsideration of the implementation schedule until October 1, 1999 on the "identify each service provider" requirement. Even that requirement would have been very burdensome and a greater revision of the schedule required, had the billing system change not already been underway in SNET.

The requirement to indicate deniable vs. non-deniable charges on the customer bill is a much more burdensome requirement than the identify service provider requirement for SBC companies, other than SNET². Again, SNET has recently revamped its billing system and it already indicates the total deniable charges that must be paid in order to avoid suspension of local service. Pacific Bell and Southwestern Bell Telephone Company, however, have not yet undertaken that major billing system change. SBC filed affidavits in support of its Petition for Reconsideration setting forth an estimate that more than 1,000 workdays would be required by all disciplines to implement this change so

² As stated in the *Petition for a Waiver or a Stay* filed by SBC on July 26, 1999, SNET is the only SBC company currently able to clearly distinguish between deniable and non-deniable charges on its bill today. SNET is able to make that distinction because of a major revamping of its entire billing system that was done prior to the release of the Truth-in-Billing Order. There was some confusion between this earlier major billing project and the current SNET billing project in the summary included in the Appendix C to *USTA's Comments Regarding OMB Control No. 3060-0854 Truth-in-Billing and Billing Format*, at page 6. It is the current billing project that has taken about four and a half months from start to finish. This billing project does not pertain to the "deniable/non-deniable" requirement; it is for the purpose of allowing SNET to identify service providers that are billing through a billing aggregator.

that Pacific Bell, Nevada Bell and Southwestern Bell Telephone Company would be able to indicate the total deniable charges on their bills in the same manner as SNET. For that reason, SBC sought reconsideration of the schedule to allow implementation by March of 2000. Even that implementation date is burdensome in the context of final preparations for Y2K. SBC has committed that it will begin the work on the billing system changes to comply with this requirement, but cannot commit to actually implement the changes until after March 1, 2000 because implementing billing changes while the Y2K freeze is pending could jeopardize SBC's Y2K preparations, as documented in the attached affidavit of Betsy Farrell, which is incorporated here for all purposes.

SBC is not contesting the requirement that this billing change be implemented; SBC is simply seeking a reconsideration of the schedule. It is SBC's belief that the FCC underestimated the burden on local exchange companies of implementing even seemingly simple changes to the massive billing systems that generate bills for millions of end user customers on a monthly basis. Great care must be taken in implementing any billing system change on systems so large. Thus, significant amounts of time are required for such changes to be implemented properly in order to avoid any adverse impact on the billing system, the company, or its end user customers.

There has been an even much more serious miscalculation of the burden of complying with the requirement to identify new service providers. The data gathered by the Commission in through the Notice of Proposed Rulemaking in CC Docket No. 98-170³ related to a requirement to explain any new types of charges appearing on the bill for the first time. When faced with a barrage of comment about the fact that

3 Truth-in-Billing and Billing Format, Notice of Proposed Rulemaking, CC Docket No. 98-170, 13 FCC Rcd 18176 (1998).

implementation of such requirement would be extremely burdensome,⁴ the Commission's analysis of the burdensomeness of its substitute requirement appears to consist of a mere assumption that the revision to only require that each new service provider be highlighted, as opposed to each new service, would make the requirement manageable.⁵

Such assumption was unfounded. SBC does not know of any way to comply with the rule as written other than by a direct comparison of each individual customer's bill with that customer's previous month's bill. While it may be true such comparison might involve substantially less billing lines of data to be compared, it still would require the creation of a procedure to compare each month's bill for each individual customer to the previous month's bill. Such project would still be prohibitively expensive.

The goal of the Commission in seeking to ensure that customers have the information necessary to determine that they are being billed by a new carrier is laudable. However, the other changes required by the Truth-in-Billing requirements provide customers all the necessary information to allow them to make that determination. As of October 1, all SBC LECs will be identifying every service provider that is billing charges on the telephone bills it issues. Given that information, a customer should be able to spot any carrier from whom it does not recall purchasing services any services. Further, the requirement that an 800 inquiry telephone number be displayed for each of those service providers means that if the customer has any doubts about the validity of the calls, it can easily contact the service provider responsible for the charges to secure additional details to determine the validity of the charge. The Commission has not sufficiently considered

⁴ The statement in the Order is that: "Virtually all carriers assert that their current billing systems cannot conduct a month-to-month comparison of all charges as would be necessary to identify and explain all new services being billed for the first time, and that the modifications necessary to perform this function would be prohibitively expensive."

⁵ In support of the Commission's statement that this requirement would be considerably more economical to implement, footnote 98 of the Truth-in-Billing Order reads: "Month-to-month comparison of service providers would involve far less data than comparison of all billed charges."

the fact that the other Truth-in-Billing requirements provide an alternative way to minimize the provision of information in that those rules render the "identify each new service provider" requirement unnecessary. Another unfortunate consequence of the change from "service" to "service provider" is the fact that the requirement, as stated, would require highlighting the customer's chosen carriers for inter or intraLATA toll, merely because the customer did not happen to make an inter or intraLATA call the month before. It seems likely that highlighting the customer's chosen carrier in such circumstances as a "new service provider" would cause more confusion, rather than alleviate customer confusion as intended by the Truth-in-Billing rules.

For all of the reasons set forth above, SBC strongly supports the proposal of USTA that the FCC should hold further Truth-in-Billing implementation requirements, particularly with regard to 47 C.F.R. §§ 64.2001(a)(2)(ii) and 64.2001(c), in abeyance until at least April of 2000.

Respectfully Submitted,

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Attorneys for SBC Communications Inc.
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August 30, 1999

AFFIDAVIT OF BETSY FARRELL

State of California

County of Contra Costa

BEFORE ME, the undersigned authority, on this day personally appeared Betsy Farrell who, after having been by me duly sworn, on oath deposes and says that:

1. My name is Betsy Farrell and I have been an employee of Pacific Bell for the past fifteen years. I am over the age of eighteen and am not otherwise prohibited by law from making this affidavit. My title is Director, SBC Y2K Information Technology. I have responsibility for overall program management of the Information Technology Year 2000 Project for SBC, which includes responsibility for managing the technical changes to ensure that SBC's billing system is Y2K compliant. All matters recited herein are true and correct to the best of my knowledge.

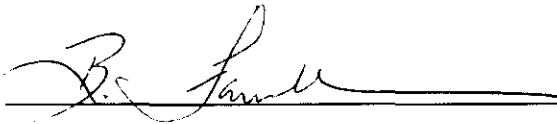
2. The Information Technology Organization (IT) for SBC is responsible for more than one thousand (1,000) applications, five (5) major data centers, three (3) bill print centers, one hundred and twenty thousand (120,000) desktops and related infrastructure components. IT has been working on the Y2K problem since 1996 and has invested considerable time and resources into correcting both hardware and software issues. Testing and validation of these changes was critical to SBC's Y2K readiness program.

3. Once changes are made to the software programs, those changes are being tested through the normal testing process. In addition, the programs are being placed into a time machine environment where dates past 1/1/2000 are tested. Final time machine testing is occurring just prior to November of 1999.

4. The Chief Information Officer for SBC has directed SBC to implement a code freeze, so that SBC does not risk the negation of all the testing that has occurred to bring our systems to a Y2K ready state and to stabilize systems and minimize changes to already tested systems. The code freeze prohibits any billing system changes from being implemented between November 1, 1999 and March 1, 2000. It is of critical importance that the extensive Y2K testing that has already been or is being completed not be undermined by a last minute change which would not have time to go through the same rigorous testing process.

5. Programming work can continue through the code freeze period, so long as the actual implementation of the billing or other systems changes is delayed until sometime after March 1, 2000.

AFFIANT'S SIGNATURE

A handwritten signature in dark ink, appearing to read "B. Farrell", is written over a horizontal line.

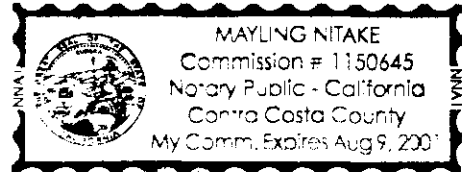
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OF AUGUST, 1999.

Mayling Nitake
Notary Public, in and for the State of California



Certificate of Service

I, Katie Turner, hereby certify that the foregoing "Comments of SBC Communications Inc." in CC Docket No. 98-170 has been served on August 30, 1999 to the Parties of Record.


Katie Turner

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